

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL PROTECTION  
BUREAU, *et al.*,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC FINANCIAL  
SOLUTIONS, LLC), *et al.*,

Defendants, and

STRATEGIC ESOP, *et al.*,

Relief Defendants.

24-CV-40 (EAW) (MJR)

**NOTICE OF FIDELIS LEGAL SUPPORT SERVICES, LLC, THE  
BUSH LAKE TRUST, TWO SQUARE ENTERPRISES, INC., BDC  
GROUP, LLC, AND VETERIS CAPITAL, LLC'S MOTION FOR A  
STAY PENDING APPEAL**

Nature of Action:	Enforcement of the Telemarketing and Consumer Fraud and Abuse Prevention Act and the Telemarketing Sales Rule.
Movant:	Fidelis Legal Support Services, LLC, The Bush Lake Trust, Two Square Enterprises, Inc., BDC Group, LLC, and Veteris Capital, LLC.
Date and Time:	Movants respectfully request a ruling from the Court by June 20, 2025.
Place:	Before The Hon. Elizabeth A. Wolford, Chief United States District Judge, United States District Court, Western District of New York, Kenneth B. Keating Federal Building, 100 State Street, Rochester, New York 14614, and/or, The Hon. Michael J. Roemer, United States Magistrate Judge, United States District Court, Western District of New York, Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York 14202
Supporting Papers:	Memorandum of Law, dated June 3, 2025.
Answering Papers:	Answering papers shall be filed by June 17, 2025, unless the Court orders otherwise. <i>See</i> W.D.N.Y. LOCAL R. CIV. P. 7(b)(2)(B).

Reply Papers: Reply papers shall be filed by June 19, 2025, unless the Court orders otherwise. *See* W.D.N.Y. LOCAL R. CIV. P. 7(b)(2)(B). Movants intend to file a reply by June 18, 2025.

Relief Requested: An order granting a stay pending appeal, or, in the alternative, granting a stay that will expire upon the Second Circuit's consideration and resolution of the Movants' forthcoming motion for a stay pending appeal.

Grounds for Relief: The Movants will suffer irreparable harm absent a stay.

Oral Argument: Not requested.

Dated: Buffalo, New York  
June 3, 2025

By: s/Timothy W. Hoover  
Timothy W. Hoover  
Spencer L. Durland  
HOOVER & DURLAND LLP  
561 Franklin St.  
Buffalo, NY 14202  
(716) 800-2600  
*thoover@hooverdurland.com*  
*sdurland@hooverdurland.com*

Stephen E. Frank (*pro hac vice* pending)  
Alex H. Loomis (*pro hac vice* pending)  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
111 Huntington Ave., Suite 520  
Boston, MA 02199  
(617) 712-7100  
*stephenfrank@quinnemanuel.com*  
*alexloomis@quinnemanuel.com*

Alec A. Levy (*pro hac vice* pending)  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
1300 I St NW, Suite 900  
Washington, DC 20005  
(202) 538-8000  
*aleclevy@quinnemanuel.com*

Michael J. Brady  
Daniel J. Brady  
HAGERTY & BRADY  
69 Delaware Ave., Suite 1010  
Buffalo, NY 14202  
(716) 856-9443  
*mbrady@hagerty-brady.com*  
*dbrady@hagerty-brady.com*

*Counsel for Movants*